

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS**

VICTIM RIGHTS LAW CENTER; T.R., by and through his parent, TARA BLUNT; TARA BLUNT; A.J., by and through his parent, KAREN JOSEFOSKY; and KAREN JOSEFOSKY,

*Plaintiffs,*

V.

UNITED STATES DEPARTMENT OF  
EDUCATION; LINDA MCMAHON, in her official  
capacity as Secretary of Education; and CRAIG  
TRAINOR, in his official capacity as Acting  
Assistant Secretary for Civil Rights,

*Defendants.*

Case No. 1:25-cv-11042-MJJ

**[PROPOSED] ORDER**

**[PROPOSED] ORDER GRANTING PRELIMINARY INJUNCTION**

After consideration of the Plaintiffs’ Motion for a Preliminary Injunction (Doc. 18) (the “Motion”), it is hereby **ORDERED** that the Motion is **GRANTED**.

The Court finds that the Plaintiffs are likely to succeed on the merits of their claims under the Administrative Procedure Act and the ultra vires doctrine, that they will suffer the irreparable harms described in their memorandum of law (Doc. No. 19) without the preliminary injunction, and that the balance of equities and public interest weigh in favor of the preliminary injunction.

Accordingly, it is hereby **ORDERED** that:

1. The Defendants are, and until further order of this Court shall remain, enjoined from carrying out the mass termination announced on March 11, 2025, as to employees of the Department of Education’s Office for Civil Rights (“OCR”);

2. The Defendants shall stay the termination or elimination, and take all steps necessary to facilitate the return to duty, of all OCR employees whose employment was set to be terminated or otherwise eliminated as part of the mass terminations announced on March 11, 2025;

3. The Defendants shall reinstate or, if necessary, replace any OCR employees whose employment was terminated or otherwise eliminated as part of the mass terminations announced on March 11, 2025;

4. The Defendants shall provide notice of this Order within 24 hours of entry to all Defendants, their employees, and anyone acting in concert with them;

5. The Defendants shall file a status report with this Court within 72 hours of the entry of this Order, and every week thereafter until otherwise ordered by this Court, describing all steps the Defendants have taken to comply with this Order; and

6. This Order shall become effective immediately upon entry by this Court. The Order shall expire at \_\_\_\_\_ on \_\_\_\_\_, subject to further order of this Court.

**SO ORDERED.**

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Hon. Myong J. Joun  
U.S. District Court Judge

Respectfully Submitted,

/s/ Sean Ouellette

Sean Ouellette  
PUBLIC JUSTICE  
1620 L Street NW, Suite 630  
Washington, DC 20036  
Phone: (202) 797-8600  
souellette@publicjustice.net

L. Reid Skibell (*admitted pro hac vice*)  
Jonathan H. Friedman (*admitted pro hac vice*)  
GLENN AGRE BERGMAN & FUENTES LLP  
1185 Avenue of the Americas  
New York, New York 10036  
Tel: (212) 970-1600  
rskibell@glennagre.com  
jfriedman@glennagre.com

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be sent electronically to registered participants as identified in the Notice of Electronic Filing.

/s/ Sean Ouellette  
Sean Ouellette